

**EXHIBIT D**

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

>fake Sloan. But Truong won't agree to that either, and even if he did  
 >agree, if the expert reported that it was 99.99% certain Truong was the  
 >fake Sloan, Truong would say that wasn't good enough.  
 > I would like the other counsel (Mike Matsler) to speak to Sloan  
 >immediately, but we probably need to clear this with Jeremy Brown. Once  
 >Sloan is contacted, I believe Matsler is likely to either work out a quick  
 >deal or report that it's hopeless; Sloan is not the type to delay anything.  
 >After Matsler speaks to Sloan, maybe we send the statement privately to  
 >Truong and give him a day or two to consider it, then make it public if he  
 >doesn't resign. At that point we can better consider the options of hiring  
 >the expert and/or asking a judge to remove Truong.

>Bill Goichberg  
 > "Expert Assistance"  
 > 17 Jan 2008  
 > Hello:  
 > Unfortunately, I have been on vacation and traveling internationally since  
 >Dec 21, and I will not return until Jan 9. I will be back in the office  
 >Jan 10. As a result, I have been slow to respond to a number of your  
 >recent emails. Before I left for vacation I started drafting some thoughts  
 >on the current status, and I have added to those thoughts below. If any of  
 >the comments seem disjointed, it is because some of it was drafted before I  
 >read the recent emails.

> Background. As you of course know, we now have two reports that implicate  
 >Truong in the "Fake Sam Sloan" debacle; one report being Mottershead, and  
 >another report, provided without any solicitation, by a federation member.  
 >Additionally, my office has done some basic vetting of the data, and we did  
 >not find any factual errors in the Mottershead report based on this limited  
 >amount of work by our firm.

> We have asked Truong to formally admit or deny whether he is involved, and  
 >he has not responded. We have asked him to provide his IP address for his  
 >home computers at his current and last residence, and he has not responded.  
 >We have asked him to provide any proof that he is not involved in the Fake  
 >Sam Sloan postings, and the only response was a fax from his wife  
 >containing a plane ticket and his pay stub for his new job; this fax is not  
 >persuasive for me because we only need to show that Truong was behind any  
 >one of the many Fake Sam Sloan posting to meet our objectives (for USCF to  
 >defend itself in litigation, for USCF to persuade Truong to resign, and,  
 >potentially, for USCF to convince a judge to remove Truong as a director).

>We did also receive some allegations of him abusing the child of his  
 >current wife, Polgar. While these allegations are not relevant to the  
 >inquiry into whether he is involved in the Fake Sam Sloan postings, they  
 >could perhaps be relevant in a later inquiry about whether his removal from  
 >the board is "in the best interest of the corporation."

>It looks like Chubb recently told US Chess that it would not be covering

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

>litigation costs after the 12b6 motion; I do not know the details of this,  
 >as I just saw it referenced in a recent email to me.  
 > Lastly, the Board feels like it needs to take action on this matter  
 >fairly quickly, and the proposed action is to ask Truong publicly to resign  
 >- additionally, the Board wants to determine if Sloan would drop his suit  
 >against Truong if Truong resigns.  
 > My Talks with Proskauer. As you know, it took me a number of weeks before  
 >I could get Proskauer on the phone, due to a number of reasons, including  
 >Proskauer's then pending termination of Truong and Polgar. I was able to  
 >have a phone conference with both Jeremy Brown and one of their corporate  
 >law attorneys. First, Jeremy was clear that he did not think Chubb would  
 >pay for an expert now, so he rebuffed me quickly on that. Second, Jeremy  
 >was unwilling to have any of their corporate law attorneys perform some key  
 >research about the ability to remove Truong as a board member because,  
 >again, he did not believe Chubb would pay for it. I did quiz their  
 >corporate attorney on the phone about her opinion about Illinois law on  
 >this subject, and she was not really helpful.

>My Firm's Research re: Illinois Law. We did some very basic research  
 >in-house here, and we quickly started to focus on a particular Illinois  
 >statute that allows a nonprofit organization with voting members to file a  
 >lawsuit requesting that a court remove a director. The standard is whether  
 >the board member "engaged in fraudulent or dishonest conduct or has grossly  
 >abused his position to the detriment of the corporation," and "removal is  
 >in the best interest of the corporation." This would be in the form of a  
 >cross claim in the current litigation or a new lawsuit with a fairly simple  
 >complaint, asking a judge to remove Truong, based on the Illinois statute  
 >that allows a court to do so. Illinois Compiled Statutes Annotated, Ch.  
 >805, Act 105 (105/108.35 Removal of Directors). Importantly, the Board  
 >cannot take any action on its own to remove a director.

> Expert Assistance. If the Board feels like it is essential to determine  
 >whether one of its directors, Truong, has engaged in misconduct, and the  
 >Board feels as if it must know this before April/May/June of 2008 (after a  
 >decision on the motion to dismiss), then the Board should hire an expert  
 >now. I was hoping that Proskauer would be able to hire the expert, which  
 >would be paid through Chubb. However, this decision is many months away,  
 >and it looks like Chubb may be denying coverage. Proskauer feels that it  
 >must try to use procedural arguments first, as a way to obtain a dismissal,  
 >in which case an expert would not be needed at all. The hearing on the  
 >motion to dismiss is not scheduled until February, and assuming any  
 >dismissal would be granted with leave to amend, we are looking at many  
 >months before a potential dismissal without leave to amend.

> What sort of expert? I feel strongly that the Board should engage a  
 >litigation expert who can not only vet the current "Fake Sam Sloan"  
 >investigative reports, but also a) conduct his own brief investigation and  
 >b) testify at trial if necessary. Dr. Cohen is an ideal candidate. He has

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

>a very strong forensic investigation background, and he is very strong in  
>the area of SMTP / IP addresses / Usenet. I have used him recently in a  
>significant spam litigation case in federal court, and, simply stated, he  
>is head and shoulders above the other expert in terms of experience and  
>persuasive abilities. Due to his background in technical forensics, he  
>will be uniquely qualified to comment on the "chain of evidence," and his  
>past research and own personal technical projects make him uniquely  
>qualified to investigate the potential for spoofing or other allegations  
>that Truong has been "set up."  
> All this said, here are some options to consider:

> 1. Do Nothing. With this option the board lets the NY litigation take  
>its course, informing its membership that the Board cannot make any  
>comments on this matter while litigation is pending. US Chess will be  
>pointing the finger directly at Truong, in the form of a cross action, if  
>the lawsuit survives the motion to dismiss.

> 2. Ask Truong Publicly to Step Down. There are two things to use  
>potentially as leverage after you ask Truong to step down. First, if you  
>can get Sloan to drop the lawsuit, that would obviously be best; however,  
>my gut tells me that that will be difficult. Also, if Sloan keeps the  
>defamation allegations in the lawsuit, the Board may want to cross claim  
>against Truong, which will be more difficult if he has been dismissed by  
>Sloan (i.e. the Board would have to add Truong as a party). It sounds like  
>you have other counsel that has dealt with Sloan before who could contact  
>Sloan; if he cannot do it, I would be happy to contact Sloan (keep in mind  
>I will not be back in the office until Jan 10). Second, the board could  
>threaten to initiate a separate action against Truong, in Illinois, to  
>remove him from the Board, if Truong does not resign. We could even  
>provide Truong with a simple draft complaint that we will threaten to file  
>if he does not step down.

> I have provided some comments on your proposed letter in redline format,  
>attached.

> 3. Plan to Ask the Court in NY to Remove Truong. Even though a NY court  
>may be disinclined to take this sort of equitable action (as opposed to an  
>Illinois court), it would be simple cross-claim to make. Please note that  
>we have not done the research as to whether this sort of cross claim would  
>be subject to a motion to dismiss due to it being brought in NY as opposed  
>to Illinois.

> 4. File a Separate Action Against Truong in Illinois or Tennessee. With  
>or without prior notice to Truong, this action would be to remove Truong  
>because he has "engaged in fraudulent or dishonest conduct or has grossly  
>abused his position to the detriment of the corporation," and "removal is  
>in the best interest of the corporation." This is essentially a lawsuit  
>(the same allegation of the cross claim I described above), with a fairly  
>simple complaint, asking a judge to remove Truong. Because Sloan would not  
>be a party, he would not see any of the discovery materials obtained from

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

>ISPs. Also, and perhaps most importantly, Truong may not be in a position  
>to litigate this matter separately from the NY action, resulting in a very  
>quick resolution of the matter. I must qualify this option by saying that  
>we only did limited research on this Illinois statute, and my opinion  
>regarding the sufficiency of such a suit, and regarding where the suit  
>could be brought, may change upon further research.  
> I wish I could provide further guidance to you on the phone before Jan  
>10, when I return, but I am in a different time zone, and my connectivity  
>is spotty. I will continue to monitor my email as much as possible this  
>week before I get back to the office.  
> Very best regards,  
> Karl  
>  
>Karl S. Kronenberger  
>KRONENBERGER BURGOYNE, LLP

Subject: This is bad USCF politics

From: nobody@nowhere.com

Date: Fri, 8 Aug 2008 19:35:36 -0600 (MDT)

Message-ID: <a9a26e3d0c20cb38acd083a4ba93f4cd@pseudo.borked.net>

Bytes: 15041

Lines: 372

Path: newsread1.mlpsca01.us.to.verio.net!newspeer1.mlpsca01.us.to.verio.net!news-out.superfeed.net!  
sp6iad.superfeed.net!news-in2.spamkiller.net!news.bananasplit.info!mail2news.mixmin.net

Newsgroups: alt.chess

Sender: Borked Pseudo Mailed <nobody@pseudo.borked.net>

Comments: This message did not originate from the Sender address above.

It was remailed automatically by anonymizing remailer software.

Please report problems or inappropriate use to the  
remailer administrator at <admin@pseudo.borked.net>.

X-No-Archive: YES

Bill shares with friends

30 Jan 2008

Chessoffice@aol.com wrote:

To the EB committee on Truong/Sloan matters:

This is an update on where we stand regarding getting Sloan to drop his lawsuit against USCF. It also contains a motion.

Because we all were asked to keep matters confidential, I had not provided info on this matter to my

**POL000189**

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

friend Jerry Hanken. However, from speaking to other sources, Jerry became aware of what was happening, and told me he knew that a Board statement asking Truong to resign had been approved. I then told him that we would like, in view of that statement, to have Sam withdraw his suit against USCF.

Jerry is somewhat friendly with Sam (more than most people in the chess world) because after Sam was elected, for several months Jerry was in close touch with him, defending him to some extent and trying to persuade him to act more responsibly. Jerry had some successes, such as convincing Sam to apologize to Grant Perks for suggesting he had committed criminal acts, but eventually gave up and decided that Sam is hopeless. Even so, they talk sometimes and Sam is more likely to listen to Jerry than to any of us.

Jerry suggested that he approach Sam suggesting that if he dropped USCF from his lawsuit, the EB Committee would issue a statement calling on Paul to resign. I said no, we need a lawyer to do that in case Sam raises issues requiring legal expertise. Jerry called Sam anyway, urging him to drop USCF from the suit but not mentioning the possibility of a motion asking Paul to resign. Sam's reaction was fairly positive, he said he was considering that anyway. Jerry reported that to me and I felt that we don't need a lawyer to negotiate with Sam and Jerry would do better. I called Randy Bauer and he agreed. I think Jerry has saved us some legal fees and I appreciate that.

Jerry then called Sam again the next day (yesterday) saying he was urging the Committee to make a public statement calling on Paul to resign, and if Sam would agree to drop USCF from his suit he thought this statement was likely to be issued. Sam quickly agreed to this. Jerry reported this to me and I suggested that he confirm his understanding with Sam by email. He called Sam again today to set this up and Sam had a new demand, that I issue a public apology to him. Jerry told him he thought that was out of the question and Sam hung up on him. Jerry called back and Sam spoke to him but was adamant.

I don't know what Sam wants an apology for, but I can't think of any apology I could make to him that would be appropriate. I suppose if we decide it is proven that Paul is the fake Sloan, an apology might be in order on behalf of USCF for inappropriate postings by a Board member, but we are not ready to say that Paul is the fake Sloan, only that he has violated his fiduciary duty. So unless the Committee thinks I should apologize for something as part of a deal, I move the following:

Moved, that unless one of our attorneys recommends against this, the Committee issues the following public statement:

The USCF Executive Board has received a complaint from Brian Mottershead alleging that Executive Board member Paul Truong is responsible for making a large number of defamatory internet posts under the guise of Sam Sloan and other individuals. This allegation has received widespread attention in national and local media and chess forums, and a federal lawsuit filed by former Executive Board member Sam Sloan alleges that the forged posts, some of which used his name, damaged his reputation and impacted the outcome of last year's Executive Board election.

This lawsuit names the USCF as an organization and each of the individual board members as defendants and seeks, among other things, payment for damages in the millions of dollars. As can be

**POL000190**



*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

expected, the Executive Board takes these allegations and this lawsuit very seriously. As a result, the USCF Executive Board formed a Committee, consisting of Randy Bauer (chair), Bill Goichberg, Joel Channing, Randy Hough and Jim Berry to investigate the alleged wrongdoing. The USCF Executive Board also hired outside legal counsel with Internet law expertise, Kronenberger Burgoyne, to advise the Committee.

Because the allegations against Paul Truong include a period of time in which he was a member of the Executive Board, it is vitally important that he affirmatively assist the USCF in defending against this lawsuit. Based on the advice of counsel, a letter was sent via both email and Federal Express to Paul Truong on November 29, 2007, seeking information that counsel deems critical to the USCF, both for defending this lawsuit and any other legal actions that may arise based on the allegations.

Specifically, the USCF asked Paul Truong to provide, by December 7, 2007, the following:

Formally admit or deny, in writing, whether he was involved in the "Fake Sam Sloan's postings, or had knowledge of who made such postings; Provide the IP address of all his home and work Internet connections since 2005, or provide consent for the Board to obtain and cooperate in the Board obtaining, such IP addresses from ISPs and other entities; Provide all information that would support his argument that he was not located at his computer(s) at the time of alleged Fake Sam Sloan postings; to include information relating to his travel.

To date, the USCF has not received a response to items 1 and 2 and incomplete information relating to item 3.

As an Executive Board member, Paul Truong has a clear fiduciary duty to the USCF and its membership to cooperate in the USCF investigation and defense relating to the allegations. Regardless of the merits of the claims, Mr. Truong has neglected his fiduciary duties, and based on discussions between him and our attorney, there seems little likelihood this situation will change in the near future.

Given the many issues facing the USCF and the need to focus its time and attention on, among other things, its finances, organization of national events and support for US players in major international competitions, we believe that the interests of the USCF would best be served by Paul Truong voluntarily resigning from the Executive Board.

This is not and has not been our desired outcome. We each hoped that Paul Truong would cooperate with the USCF in a) formally denying the allegations, and b) expeditiously refuting the allegations that have been made, but this has not been the case. We also recognize that the original allegations against Truong were raised by Mr. Mottershead, despite a valid, written non-disclosure agreement that Mottershead entered with USCF

Regardless of the circumstances, the fact is that a lawsuit has been filed, and all Executive Board members have a duty to help us defend against it. Given Paul Truong's unwillingness to do so, we believe that there is no other recourse than to ask that he resign from the Executive Board of the USCF.

The Committee asks Randy Bauer as chairman to post this statement on the USCF Issues Forum three days after passage of this motion, and to send the motion to Paul Truong as soon as possible after

**POL000191**

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

passage, along with the planned posting date, to give him a final opportunity to resign before its release. Paul can say that he admits no guilt and is resigning for the good of the Federation. If he resigns before the statement is posted, the statement shall become void, and the Committee will issue a new statement thanking him for resolving the issue.

Note: based on previous discussion, I expect Joel Channing to vote no on this motion. Joel, if you do so could you add a note of explanation so members will know that you are not supporting Truong's actions, but rather would like to see a motion directed against both Truong and Mottershead?

Bill Goichberg

Bill says run!

17 Jan 2008

"1. Do Nothing. With this option the board lets the NY litigation take its course, informing its membership that the Board cannot make any comments on this matter while litigation is pending. US Chess will be pointing the finger directly at Truong, in the form of a cross action, if the lawsuit survives the motion to dismiss."

Very unappealing.

I believe that Sloan would drop his suit in return for Truong's resignation, but Truong won't resign.

Sloan has stated that he would drop his suit if USCF hired an internet expert and Truong agreed to resign if the expert reported that he was the fake Sloan. But Truong won't agree to that either, and even if he did agree, if the expert reported that it was 99.99% certain Truong was the fake Sloan, Truong would say that wasn't good enough.

I would like the other counsel (Mike Matsler) to speak to Sloan immediately, but we probably need to clear this with Jeremy Brown. Once Sloan is contacted, I believe Matsler is likely to either work out a quick deal or report that it's hopeless; Sloan is not the type to delay anything. After Matsler speaks to Sloan, maybe we send the statement privately to Truong and give him a day or two to consider it, then make it public if he doesn't resign. At that point we can better consider the options of hiring the expert and/or asking a judge to remove Truong.

Bill Goichberg

"Expert Assistance"

17 Jan 2008

Hello:

Unfortunately, I have been on vacation and traveling internationally since Dec 21, and I will not return until Jan 9. I will be back in the office Jan 10. As a result, I have been slow to respond to a number of your recent emails. Before I left for vacation I started drafting some thoughts on the current status, and I have added to those thoughts below. If any of the comments seem disjointed, it is because some of it was drafted before I read the recent emails.

Background. As you of course know, we now have two reports that implicate Truong in the "Fake Sam Sloan" debacle; one report being Mottershead, and another report, provided without any solicitation, by a federation member. Additionally, my office has done some basic vetting of the data, and we did not find any factual errors in the Mottershead report based on this limited amount of work by our firm.

**POL000192**



*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

We have asked Truong to formally admit or deny whether he is involved, and he has not responded. We have asked him to provide his IP address for his home computers at his current and last residence, and he has not responded. We have asked him to provide any proof that he is not involved in the Fake Sam Sloan postings, and the only response was a fax from his wife containing a plane ticket and his pay stub for his new job; this fax is not persuasive for me because we only need to show that Truong was behind any one of the many Fake Sam Sloan posting to meet our objectives (for USCF to defend itself in litigation, for USCF to persuade Truong to resign, and, potentially, for USCF to convince a judge to remove Truong as a director).

We did also receive some allegations of him abusing the child of his current wife, Polgar. While these allegations are not relevant to the inquiry into whether he is involved in the Fake Sam Sloan postings, they could perhaps be relevant in a later inquiry about whether his removal from the board is "in the best interest of the corporation."

It looks like Chubb recently told US Chess that it would not be covering litigation costs after the 12b6 motion; I do not know the details of this, as I just saw it referenced in a recent email to me. Lastly, the Board feels like it needs to take action on this matter fairly quickly, and the proposed action is to ask Truong publicly to resign – additionally, the Board wants to determine if Sloan would drop his suit against Truong if Truong resigns.

My Talks with Proskauer. As you know, it took me a number of weeks before I could get Proskauer on the phone, due to a number of reasons, including Proskauer's then pending termination of Truong and Polgar. I was able to have a phone conference with both Jeremy Brown and one of their corporate law attorneys. First, Jeremy was clear that he did not think Chubb would pay for an expert now, so he rebuffed me quickly on that. Second, Jeremy was unwilling to have any of their corporate law attorneys perform some key research about the ability to remove Truong as a board member because, again, he did not believe Chubb would pay for it. I did quiz their corporate attorney on the phone about her opinion about Illinois law on this subject, and she was not really helpful.

My Firm's Research re: Illinois Law. We did some very basic research in-house here, and we quickly started to focus on a particular Illinois statute that allows a nonprofit organization with voting members to file a lawsuit requesting that a court remove a director. The standard is whether the board member "engaged in fraudulent or dishonest conduct or has grossly abused his position to the detriment of the corporation," and "removal is in the best interest of the corporation." This would be in the form of a cross claim in the current litigation or a new lawsuit with a fairly simple complaint, asking a judge to remove Truong, based on the Illinois statute that allows a court to do so. Illinois Compiled Statutes Annotated, Ch. 805, Act 105 (105/108.35 Removal of Directors). Importantly, the Board cannot take any action on its own to remove a director.

Expert Assistance. If the Board feels like it is essential to determine whether one of its directors, Truong, has engaged in misconduct, and the Board feels as if it must know this before April/May/June of 2008 (after a decision on the motion to dismiss), then the Board should

Newsgroups: rec.games.chess.politics,rec.games.chess.computer,rec.games.chess.misc,alt.chess  
Subject: Re: Frustrated Kronenberger

**POL000193**

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

Message-ID: <489cf787.21569468@ca.news.verio.net>

References: <eb6d903a137d6948aa36d5203cb6815a@pseudo.borked.net>

Date: Sat, 09 Aug 2008 01:49:39 GMT

On Fri, 8 Aug 2008 18:58:28 -0600 (MDT), nobody@nowhere.com wrote:

>28 Dec 2008

> Hello:

> I wanted to give you a quick update. I must say that I am a bit  
>frustrated with how slow this process has taken, but we did have a bit of a  
>breakthrough today. To summarize, when I spoke to the Proskauer firm, they  
>were able to get one of their corporate law attorneys on the call to review  
>some of my thoughts and potential recommendations to the committee.  
> Unfortunately, they are unwilling to push Chubb to pay for an expert now,  
>which is the main reason I wanted to talk to them. The corporate counsel  
>did give me, to an extent, her comments on my suggestions. However, they  
>were unwilling to put any time into researching the important Illinois  
>corporate law issues I wanted them to look into. They said they know Chubb  
>would reject this, due to where they are in the case right now (moving into  
>a motion to dismiss). Thereafter, my associate did some research, and  
>today we did reach some conclusions on the corporate law matter. I will  
>work diligently to summarize my thoughts.  
> Regarding the demand to Truong, he did not comply with the demand, except  
>for a fax Polgar sent containing a Southwest ticket confirmation and a pay  
>stub at his new job. As I told Polgar, all US Chess needs to do is to  
>prove one, just one, instance where Truong impersonated Sloan in order to  
>prevail. More importantly, Truong has not provided confirmation of his IP  
>addresses, consented to us obtaining his IP addresses, or denied in writing  
>that he has any knowledge or involvement in the Fake Sam Sloan postings (I  
>believe that one person on this committee commented that Truong has denied  
>this in an email, but a) I could not find that email and b) I want a clear  
>denial in writing faxed or FedEx'ed to my office -- which I will clarify to  
>him later).  
> As I said, I will work diligently to get my recommendations to you now  
>that I have this research under my belt.

> Thanks,

> Karl

> Mottershead

> 3 Jan 2007:

> It has already been confirmed in writing, publicly, and he was told that  
>if he didn't step down he would be suspended. Are you suggesting we make a  
>public announcement now that if he hadn't stepped down he would have been  
>suspended? I don't like this because we urged him to step down precisely  
>to avoid that type of announcement being made, so we would not be keeping  
>our word.  
> Bill Goichberg

**POL000194**

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

> I concur that we do not want to let Mottershead off the hook. What he  
> did was clearly wrong, and he likely knew it was wrong at the time. What I  
> am suggesting is that we create a private paper trail that evidences how we  
> have dealt with Mottershead.  
> Kronenberger

Sender: Borked Pseudo Mailed <nobody@pseudo.borked.net>

Comments: This message did not originate from the Sender address above.

It was remailed automatically by anonymizing remailer software.

Please report problems or inappropriate use to the  
remailer administrator at <admin@pseudo.borked.net>.

Subject: Second forensic expert finds problems

From: nobody@nowhere.com

X-No-Archive: YES

Message-ID: <f8e1cab384c89a7ead96d27ddf07539b@pseudo.borked.net>

Date: Fri, 8 Aug 2008 18:54:08 -0600 (MDT)

Newsgroups: rec.games.chess.politics

Path: newsread1.mlpsca01.140.142.12.140.MISMATCH!news.u.washington.edu!news.alt.net!  
news.wiretrip.org!news.bananasplit.info!mail2news.mixmin.net

26 Oct 2007

Good Morning, Joel:

I appreciate your concern but I strongly suspect that any investigation that we or another company does will not yield results of "evidential value"; by that I mean provable, by a preponderance of facts, evidence upon which one would rely to not just bring a complaint to court, but to actually prevail on that complaint at trial. Rather, what I expect that we could find, depending on how your emails have been preserved since the time of these incidents, is evidence that someone was "spoofing", that is, impersonating another's email.

The way this is usually discerned is in the differences in the IP addresses of the email owner and the impersonator. Assuming that one did find a difference in IP addresses, then the different IP address would have to be traced. And it is in that step that I believe we would come up empty, as the canny spoofer will have covered his/her tracks. Thus, the best outcome I would foresee is that we could show that an unknown someone was impersonating the true email account holder. And even then, one couldn't rule out the possibility that the true email account holder was spoofing him/herself, a tactic one imagines a skilled chess player might use.

POL000195

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

We also discussed yesterday that some of your Board want to learn whether an imposter was posting scurrilous messages about other members on message boards, chat rooms, etc. I have had direct, recent experience with this kind of activity involving the alleged leaking of insider information in one case and the making of what were clearly defamatory comments about an individual. Short of a subpoena which generally can only be issued by a party after litigation has already commenced, or a warrant or similar authority from law enforcement, entities like Yahoo, AOL, Hotmail, MSN and Google will refuse to disclose any ownership or account holder's records. Even in cases where the posting violates the service provider's own rules, the best reaction one can get is the the allegedly offending postings are removed and the individual's account is shut down. But nothing prevents that individual from setting up another account with the same or a different provider.

I sympathize with the Board members who feel outrage at what they believe has happened. Realistically, however, I believe that an investigation would show possibilities, perhaps probabilities, but not certainties. And, if the Federation has not already done so, we would make recommendations to insure that the network and email system was less vulnerable to these kinds of attacks.

Please feel free to call or email with comments, questions...

Regards,

Mike

byte-metrics.com

forensics advice

Hi Joel: I've asked my broker to give me a quote for \$2 Mil / \$4 Mil. Whatever the increase, my custom and practice is to accede to a client's demand for higher coverage but to absorb that increased cost within a higher rate. I do have a standard contract but let's get the insurance question answered and then let's talk. I want to make sure that I fully understand your concerns and expectations. In particular, if you believe that, regardless of the outcome of an investigation, my company and possibly me personally will be named in a current or new claim by a disgruntled member, I need to know this from the beginning. If that or similar was your belief, I would amend my contract to include an indemnity from the Federation in the event that ByteMetrics/I was sued for doing the Federation's bidding. On the other hand, what I've envisioned up to this point is that, assuming that we were engaged, we would be so through a law firm representing the USCF. We would report our findings to the law firm and it would report to the USCF. I think it highly unlikely, given what you've described of the situation to me thus far, that a "smoking gun" would be found, or, if one was, that it would have any "fingerprints" on it. Therefore, what I've imagined so far is that our report would detail what we found and opine on the likely explanations for those findings. We would also make recommendations for additional security measures if those

POL000196

*Confidential Emails from Karl Kronenberger to the USCF Committee of Goichberg, Berry and Hough and responses, posted to rec.games.chess.politics by nobody@nowhere.com*

had not already been implemented. Assuming it was handled right, what we reported to the law firm and what it reported to the USCF would be privileged and confidential. We could have that discussion with the attorney representing the USCF, prior to our engagement. Anyway, let's talk, if you wish, of course. I'm reachable at --. Regards, Mike  
byte-metrics.com

22 Oct 2008

Good Morning, Joel:

I hope you are doing well.

I saw the prior NY Times article. What a tangled web...

Please let me know if I can help. And please bear in mind that the preferred way to do this is through a law firm to help insulate the USCF from having to reveal what it learns from any investigation.

Regards,

Mike

byte-metrics.com

First Forensic expert finds problems.

11 Oct 2008

Hi Randy,

Please find attached 2 documents. One is our standard contract and the other is Schedule A (cost and time estimate). If all looks good simply sign the contract and send back with 1/2 payment.

As I noted in the "Comments" section of Schedule A, Leonard Stimmel, our expert, has already identified some technical discrepancies during his initial review.

I look forward to hearing back!

Greg

Greg Beckemeier

United Forensics

POL000197



**EXHIBIT E**

Subject: Next Steps re: Truong and Polgar

Greetings.

While I have not been in contact in a week or so, a good amount has happened, much of it just recently.

**Proskauer Representation of Truong & Polgar.** Proskauer called me yesterday morning (the firm representing the USCF in the Sloan suit), and they asked me if I could give them my opinion about the legitimacy of the Mottershead report, because they were considering terminating their representation of Truong and Polgar due to a potential conflict. I told them that I did not want to say anything at this point, but that I would be providing a draft letter to the committee later today, with the recommendation that the committee approves me sending it to Truong and Polgar. I told them that I would provide the letter to them if the committee approves it. They then called back 30 minutes later to inform me that they would definitely be terminating representation of Truong and Polgar. They provided me a draft termination letter of Truong and Polgar for my review.

I see this as good timing for us, as I am recommending in this email to send a letter to Paul, cc'ing Susan. At the outset of the letter, I will make crystal clear that Board takes the allegations and the Board members' duties toward its members very seriously, as it must. As a result, we have established a committee and are aggressively investigating the source of the "Fake Sam Sloan" postings and related events. The committee expects everyone who is in any way affiliated with USCF to cooperate in every way possible in this investigation (this is detailed further below). The letter would then briefly lay out the grounds for the causes of action USCF has against the wrongdoer, and informing Truong of his fiduciary duty (as long as he is a board member) to cooperate with the investigation.

**Factors Influencing Strategy.** As we discussed in our conference call a few weeks ago, we want to put Truong in a position where he has an incentive to resign from the board, and indeed does resign from the board. At the same time, we want to get out of the Sloan litigation as soon as possible. After several discussions with Proskauer, and after a good amount of research into Sloan and his litigious nature, I am now of the opinion that not only will the litigation drag on for quite some time, but that the USCF's best defense will be to prove that Paul Truong is indeed the Fake Sam Sloan. I must emphasize that, while the litigation may be protracted, it still appears that the current and potential causes of action against USCF and its board members (with the exception of Truong and Polgar) relating to the Fake Sam Sloan postings are without merit and will eventually all be dismissed.

1/5/2009

**POL000318**

**Expert Assistance.** You have provided me information from United Forensics in St. Louis as a possible firm to review Mottershead's report. My recommendation is that the board should not just engage an expert to verify this report, but it should engage an expert to review all of the evidence that we now have and that we will obtain through the discovery process. This expert should have the experience to be our expert at trial as well. Importantly, because you will need to engage an expert at some point in the litigation, it would be more cost efficient to use the same expert for both fact gathering / verification and for serving as a litigation expert in depositions and trial. To gain the maximum work product privilege for the work of the expert, the expert needs to be engaged for the purpose of litigation and not in the ordinary course of the USCF's business. That said, you will need an expert who is well versed in Usenet, SMTP, HTTP and Internet security. With characters such as Fritz Wuehler muddying the waters, you need an expert who can immediately cut through the misleading statements (statements about "spoofing" IP addresses as just one example). There are many experts from which to choose, but I can point to one expert that has the type of background you need (Fred Cohen, CV will be distributed by Bill Hall). Regardless of who you choose, knowledge of Usenet and SMTP protocols is essential (United Forensics seems to be very criminal law-focused, by the way). I have used Dr. Cohen in the past, and he has been excellent. Proskauer may also have some recommendations, and if you need more, I would gladly provide more options for you. Once Proskauer's termination of Truong and Polgar is effective, I will bring up this issue with them.

Also regarding the engagement of an expert, if you choose an expert who can be used at trial, then your insurance company would most likely cover the expense, even if you need to engage someone early on.

**Recommendation:** Based on Polgar's and Truong's recent comments, conversations with Proskauer, and additional verifications I have conducted re: the Mottershead report, I recommend that I draft a letter to Truong, cc'ing Polgar, explaining the following:

- that the USCF takes the allegations of about Truong's fake web postings, and Truong's and Polgar's accusations against USCF, very seriously, hence the formation of the committee and the aggressive investigation;
- that the allegations against Truong, true or not, have caused and will continue to cause USCF to incur significant legal fees and costs;
- that although USCF cannot draw any conclusions until such time as it has finished its investigation, it must conclude that however the situation unfolds, USCF will have multiple causes of action against any number of parties, including without limitation for indemnity, breaches of fiduciary duties, fraud, defamation, interference with business relationships, violations of various state identify theft statutes, and additional causes of action;
- that the Board has a duty to its membership to continue to investigate the allegations against Truong until such time as USCF has a greater comfort level with the surrounding facts;
- that the Board will continue to work with its experts in investigating this matter;
- that, importantly, due to Truong's status as a board member, Truong has continuing fiduciary duties to USCF and its membership to cooperate to the greatest extent possible in the Board's investigation of the alleged wrongdoing;
- that Truong immediately do the following or provide the following information to assist in the investigation, as his fiduciary duties require:
  - that Truong formally admit or deny, in writing, whether he was involved in the "Fake Sam Sloan" postings, or had knowledge of who made such postings;
  - that Truong provide the IP address of all of his home and work Internet connections since 2005, or provide consent for the Board obtaining and cooperate in the Board obtaining, such IP addresses from ISPs and other entities;

- . that Truong provide all information that would support his argument that he was not located at his computer(s) at the time of alleged Fake Sam Sloan postings, to include information relating to Truong's travel;
- . that Truong comply with the forgoing before December 7, 2008.

Truong and Polgar would get this letter on the same day or a day after they receive notice that Proskauer has terminated them as a client. When they present my letter to new counsel appointed by Chubb, or when they present my letter to their other counsel, I suspect that their counsel would advise Truong to consider resigning from the Board, to avoid further allegations of breaches of his fiduciary duties.

If and when I would speak to Truong's counsel, I would suggest that Truong immediately resign due to his continuing breach of his past and current obligations to cooperate with the investigation. There could be some room to negotiate on terms of a resignation, but we can discuss the possibilities later if Truong is amenable to resigning. Very importantly, if Truong chooses to fight Sloan or the USCF in this litigation, the USCF will have no choice but to prove up its case with the great technical and financial resources USCF has at its disposal, and much of the benefit of that work by USCF would directly benefit Sloan, who, as stated above, does not have the resources or legal acumen to attack Truong compared to the USCF.

To put additional pressure on Truong and Polgar, I would like to contact the insurer, Chubb, and argue that they should not extend coverage to Truong and Polgar because the complaint does not allege that their wrongdoing arises from their status as directors and because Truong and Polgar both deny that they played any part in the postings. If Chubb does not cover them, then USCF benefits from Truong and Polgar hiring potentially lower quality (less expensive) counsel.

**Mottershead Continued Involvement with USCF.** We need to be careful how we deal with Mottershead. We want to keep him as friendly as possible, so he cooperates with us in our defense; however, the Board may need to take action against him due to the allegations of him breaching his confidentiality agreement. I suggest that we send a letter to Mottershead thanking him for his volunteer activities, but informing him that due to the pending litigation, we will need to suspend our relationship with him pending the outcome of the case. Thereafter, we need to change all administrator and moderator passwords that he possesses. This is a middle ground, where we can point the blame toward Sloan, and at the same time we create a record of the Board taking action in response to the allegations by Polgar and Truong.

**Future Compliance / Risk Avoidance.** I do have drafts of Terms of and Conditions of Use and a Privacy Policy for your website, which I need to review one more time before forwarding to Bill Hall for review. These new documents will give USCF considerable protection in the future in web disputes.

Let me know if you have any questions, and if not, let me know whether you want me to send the letter as described above.

Very best regards,

Karl

1/5/2009

**POL000320**

**EXHIBIT F**



Google groups

Recently Visited Groups | Help | Sign in

## rec.games.chess.politics

Search this group

Search Groups

Message from discussion [Bill says run!](#)

[samsloan](#) [View profile](#) [Translate to English \(UK\)](#)

[More options](#) 8 Aug 2008, 18:45

On Aug 8, 8:00 pm, nob...@nowhere.com wrote:

- > 17 Jan 2008
- > "1. Do Nothing. With this option the board lets the NY litigation take
- > its course, informing its membership that the Board cannot make any
- > comments on this matter while litigation is pending. US Chess will be
- > pointing the finger directly at Truong, in the form of a cross action, if
- > the lawsuit survives the motion to dismiss."
- > Very unappealing.
- > I believe that Sloan would drop his suit in return for Truong's
- > resignation, but Truong won't resign.
  
- > Sloan has stated that he would drop his suit if USCF hired an internet
- > expert and Truong agreed to resign if the expert reported that he was the
- > fake Sloan. But Truong won't agree to that either, and even if he did
- > agree, if the expert reported that it was 99.99% certain Truong was the
- > fake Sloan, Truong would say that wasn't good enough.
- > I would like the other counsel (Mike Matsler) to speak to Sloan
- > immediately, but we probably need to clear this with Jeremy Brown. Once
- > Sloan is contacted, I believe Matsler is likely to either work out a quick
- > deal or report that it's hopeless; Sloan is not the type to delay anything.
- > After Matsler speaks to Sloan, maybe we send the statement privately to
- > Truong and give him a day or two to consider it, then make it public if he
- > doesn't resign. At that point we can better consider the options of hiring
- > the expert and/or asking a judge to remove Truong.
  
- > Bill Goichberg
- > "Expert Assistance"
- > 17 Jan 2008
- > Hello:
- > Unfortunately, I have been on vacation and traveling internationally since
- > Dec 21, and I will not return until Jan 9. I will be back in the office
- > Jan 10. As a result, I have been slow to respond to a number of your
- > recent emails. Before I left for vacation I started drafting some thoughts
- > on the current status, and I have added to those thoughts below. If any of
- > the comments seem disjointed, it is because some of it was drafted before I
- > read the recent emails.
- > Background. As you of course know, we now have two reports that implicate
- > Truong in the "Fake Sam Sloan" debacle; one report being Mottershead, and
- > another report, provided without any solicitation, by a federation member.
- > Additionally, my office has done some basic vetting of the data, and we did
- > not find any factual errors in the Mottershead report based on this limited
- > amount of work by our firm.
- > We have asked Truong to formally admit or deny whether he is involved, and
- > he has not responded. We have asked him to provide his IP address for his
- > home computers at his current and last residence, and he has not responded.
- > We have asked him to provide any proof that he is not involved in the Fake
- > Sam Sloan postings, and the only response was a fax from his wife
- > containing a plane ticket and his pay stub for his new job; this fax is not
- > persuasive for me because we only need to show that Truong was behind any
- > one of the many Fake Sam Sloan posting to meet our objectives (for USCF to
- > defend itself in litigation, for USCF to persuade Truong to resign, and,
- > potentially, for USCF to convince a judge to remove Truong as a director).
  
- > We did also receive some allegations of him abusing the child of his
- > current wife, Polgar. While these allegations are not relevant to the
- > inquiry into whether he is involved in the Fake Sam Sloan postings, they
- > could perhaps be relevant in a later inquiry about whether his removal from
- > the board is "in the best interest of the corporation."
  
- > It looks like Chubb recently told US Chess that it would not be covering
- > litigation costs after the 12b6 motion; I do not know the details of this,
- > as I just saw it referenced in a recent email to me.
- > Lastly, the Board feels like it needs to take action on this matter
- > fairly quickly, and the proposed action is to ask Truong publicly to resign

### Discussions

[+ new post](#)

[About this group](#)

[Subscribe to this group](#)

This is a Usenet group - [learn more](#)

Sponsored links

[Google Message Filtering](#)

Block spam & viruses before they reach your enterprise. Sign up now. [www.google.com/postini](#)

[People Search-Search Free](#)

Current Phone, Address, Age & More.

Updated Daily-Accurate. Search Free [www.Intelius.com](#)

[House Rescue Bill Passed](#)

\$180,000 Refinance under \$999/mo.

As Seen on Good Morning America!

[www.CalculateNewPayment.com](#)

> - additionally, the Board wants to determine if Sloan would drop his suit  
 > against Truong if Truong resigns.  
 > My Talks with Proskauer. As you know, it took me a number of weeks before  
 > I could get Proskauer on the phone, due to a number of reasons, including  
 > Proskauer's then pending termination of Truong and Polgar. I was able to  
 > have a phone conference with both Jeremy Brown and one of their corporate  
 > law attorneys. First, Jeremy was clear that he did not think Chubb would  
 > pay for an expert now, so he rebuffed me quickly on that. Second, Jeremy  
 > was unwilling to have any of their corporate law attorneys perform some key  
 > research about the ability to remove Truong as a board member because,  
 > again, he did not believe Chubb would pay for it. I did quiz their  
 > corporate attorney on the phone about her opinion about Illinois law on  
 > this subject, and she was not really helpful.

> My Firm's Research re: Illinois Law. We did some very basic research  
 > in-house here, and we quickly started to focus on a particular Illinois  
 > statute that allows a nonprofit organization with voting members to file a  
 > lawsuit requesting that a court remove a director. The standard is whether  
 > the board member "engaged in fraudulent or dishonest conduct or has grossly  
 > abused his position to the detriment of the corporation," and "removal is  
 > in the best interest of the corporation." This would be in the form of a  
 > cross claim in the current litigation or a new lawsuit with a fairly simple  
 > complaint, asking a judge to remove Truong, based on the Illinois statute  
 > that allows a court to do so. Illinois Compiled Statutes Annotated, Ch.  
 > 805, Act 105 (105/108.35 Removal of Directors). Importantly, the Board  
 > cannot take any action on its own to remove a director.  
 > Expert Assistance. If the Board feels like it is essential to determine  
 > whether one of its directors, Truong, has engaged in misconduct, and the  
 > Board feels as if it must know this before April/May/June of 2008 (after a  
 > decision on the motion to dismiss), then the Board should hire an expert  
 > now. I was hoping that Proskauer would be able to hire the expert, which  
 > would be paid through Chubb. However, this decision is many months away,  
 > and it looks like Chubb may be denying coverage. Proskauer feels that it  
 > must try to use procedural arguments first, as a way to obtain a dismissal,  
 > in which case an expert would not be needed at all. The hearing on the  
 > motion to dismiss is not scheduled until February, and assuming any  
 > dismissal would be granted with leave to amend, we are looking at many  
 > months before a potential dismissal without leave to amend.  
 > What sort of expert? I feel strongly that the Board should engage a  
 > litigation expert who can not only vet the current "Fake Sam Sloan"  
 > investigative reports, but also a) conduct his own brief investigation and  
 > b) testify at trial if necessary. Dr. Cohen is an ideal candidate. He has  
 > a very strong forensic investigation background, and he is very strong in  
 > the area of SMTP / IP addresses / Usenet. I have used him recently in a  
 > significant spam litigation case in federal court, and, simply stated, he  
 > is head and shoulders above the other expert in terms of experience and  
 > persuasive abilities. Due to his background in technical forensics, he  
 > will be uniquely qualified to comment on the "chain of evidence," and his  
 > past research and own personal technical projects make him uniquely  
 > qualified to investigate the potential for spoofing or other allegations  
 > that Truong has been "set up."  
 > All this said, here are some options to consider:

> 1. Do Nothing. With this option the board lets the NY litigation take  
 > its course, informing its membership that the Board cannot make any  
 > comments on this matter while litigation is pending. US Chess will be  
 > pointing the finger directly at Truong, in the form of a cross action, if  
 > the lawsuit survives the motion to dismiss.  
 > 2. Ask Truong Publicly to Step Down. There are two things to use  
 > potentially as leverage after you ask Truong to step down. First, if you  
 > can get Sloan to drop the lawsuit, that would obviously be best; however,  
 > my gut tells me that that will be difficult. Also, if Sloan keeps the  
 > defamation allegations in the lawsuit, the Board may want to cross claim  
 > against Truong, which will be more difficult if he has been dismissed by  
 > Sloan (i.e. the Board would have to add Truong as a party). It sounds like  
 > you have other counsel that has dealt with Sloan before who could contact  
 > Sloan; if he cannot do it, I would be happy to contact Sloan (keep in mind  
 > I will not be back in the office until Jan 10). Second, the board could  
 > threaten to initiate a separate action against Truong, in Illinois, to  
 > remove him from the Board, if Truong does not resign. We could even  
 > provide Truong with a simple draft complaint that we will threaten to file  
 > if he does not step down.  
 > I have provided some comments on your proposed letter in redline format,  
 > attached.  
 > 3. Plan to Ask the Court in NY to Remove Truong. Even though a NY court

> may be disinclined to take this sort of equitable action (as opposed to an  
> Illinois court), it would be simple cross-claim to make. Please note that  
> we have not done the research as to whether this sort of cross claim would  
> be subject to a motion to dismiss due to it being brought in NY as opposed  
> to Illinois.  
> 4. File a Separate Action Against Truong in Illinois or Tennessee. With  
> or without prior notice to Truong, this action would be to remove Truong  
> because he has "engaged in fraudulent or dishonest conduct or has grossly  
> abused his position to the detriment of the corporation," and "removal is  
> in the best interest of the corporation." This is essentially a lawsuit  
> (the same allegation of the cross claim I described above), with a fairly  
> simple complaint, asking a judge to remove Truong. Because Sloan would not  
> be a party, he would not see any of the discovery materials obtained from  
> ISPs. Also, and perhaps most importantly, Truong may not be in a position  
> to litigate this matter separately from the NY action, resulting in a very  
> quick resolution of the matter. I must qualify this option by saying that  
> we only did limited research on this Illinois statute, and my opinion  
> regarding the sufficiency of such a suit, and regarding where the suit  
> could be brought, may change upon further research.  
> I wish I could provide further guidance to you on the phone before Jan  
> 10, when I return, but I am in a different time zone, and my connectivity  
> is spotty. I will continue to monitor my email as much as possible this  
> week before I get back to the office.  
> Very best regards,  
> Karl  
>  
> Karl S. Kronenberger  
> KRONENBERGER BURGOYNE, LLP

I am responding to insure that this important posting is preserved  
beyond the six days.

[Reply to author](#) [Forward](#)

---

[Create a group](#) - [Google Groups](#) - [Google Home](#) - [Terms of Service](#) - [Privacy Policy](#)

©2009 Google

**EXHIBIT G**



April 29, 2009

VIA FACSIMILE AND U.S. MAIL

Sumeena K. Bird, Esq.  
KRONENBERGER BURGOYNE LLP  
150 Post Street, Suite 520  
San Francisco, CA 94108-4707

Re: *United States of America Chess Federation v. Susan Polgar*  
USDC, Northern District of California Court Case No. 3:08-cv-05126-MHP

Dear Sumeena:

I write to respond to your letter dated April 27, 2009. In your letter, you contend that during our meet and confer conversation, I "admitted to you that [I] was in possession of previously-undisclosed correspondence between your firm and Joel Channing", etc.

This is, of course, nonsense. If you personally do not know the emails to which I referred, Karl Kronenberger surely does. They are on file with the court in Texas. They were available on the internet when my firm retrieved them originally; they remain so.

You will find that in the long run, the practice of issuing self-serving "meet and confer" letters that mischaracterize conversations you have with opposing counsel (as your April 27, 2009 letter does) serves only to foster distrust. And given the circumstances presented by this case, you might consider avoiding lectures about attorneys' ethical responsibilities.

Very truly yours,

GONZALEZ & LEIGH, LLP

G. Whitney Leigh

Two Shaw Alley  
3rd Floor  
San Francisco, CA  
94105  
TEL 415-512-2000  
FAX 415-512-2001  
GWL:lr





**EXHIBIT H**



June 10, 2009

**VIA HAND DELIVERY**

Karl S. Kronenberger, Esq.  
KRONENBERGER BURGOYNE LLP  
150 Post Street, Suite 520  
San Francisco, CA 94108-4707

Re: *United States of America Chess Federation v. Susan Polgar*  
USDC, Northern District of California Court Case No. 3:08-cv-05126-MHP

Dear Karl:

I am responding to your letter of yesterday, regarding discovery, which purported to respond to my discovery letters.

As a preliminary matter, our office sent you three meet and confer letters, not two. Your letter fails to meaningfully address almost all of the issues raised in that correspondence.

1. **The documents that plaintiffs improperly withheld on grounds of privilege:** We identified several specific and separate reasons why your assertions of attorney client privilege and the work product doctrine, as disclosed in the privilege log produced by the Texas counsel, were improper. Your response, a vague reference to an unspecified "joint defense privilege," is not adequate. The wrongfully withheld documents should have been produced months ago, and plaintiffs' blatant misuse of privilege as a grounds to delay production of these documents is sanctionable.
2. **Plaintiffs' inadequate responses to interrogatories:** Plaintiffs asserted multiple objections to our interrogatories that lacked merit, and also did not adequately answer the interrogatories. We spent a great deal of time responding to each of your objections in our meet and confer letters. You simply ignore the issue. That does not represent a good faith effort to meet and confer.
3. **The USCF's document production:** In your letter, you emphasize the number of documents and materials the USCF produced in the Texas action. This is not a basis for plaintiffs in this action – the lawsuit they filed – to fail to produce documents. And the volume of documents plaintiffs produced is not relevant to plaintiffs' failure to produce responsive documents. These are sideshow arguments.

Two Shaw Alley  
3rd Floor  
San Francisco, CA  
94105

TEL 415-512-2000  
FAX 415-512-2001



Karl S. Kronenberger, Esq.  
June 10, 2009  
Page 2

4. **E-mails available on the internet:** In your letter, you repeat your contention that I “admitted” reading email correspondence that has never been publicly disclosed on the internet. This was a false assertion the first time you made it, and it has not become true with repetition. Let me be clear once again: we have produced to you *every* email in our possession which reflects your correspondence with anyone associated with the USCF. We produced those documents on May 4, 2009 and May 8, 2009. We also produced to you multiple documents reflecting my office’s independent correspondence with Joel Channing – documents that should have allowed you to understand why your claim that I “admitted” reading emails reflecting undisclosed “confidential” correspondence between you and Mr. Channing has no basis. I note that we produced the above-described emails to you over a month ago without designation. You (understandably) have not contended that these emails should be designated confidential. In any case, as I indicate above, we have produced *all* emails reflecting your correspondence to Channing or any other present or former USCF Executive Board member in our possession. Your repeated assertion that I possess additional undisclosed “confidential” emails is both false and reckless. With respect to your interrogatories seeking information as to where Polgar viewed the emails, the emails attached to Sam Sloan’s cross-complaint in Texas show by PACER Docket entry where Ms. Polgar obtained those emails. With regard to the email previously produced as bates nos. POL0000318-321, we noticed that we inadvertently redacted the URL address from which Ms. Polgar retrieved that email. We attach that email, now showing the previously redacted URL as bates nos. POL0000462-464 (along with additional documents including the referenced email, bates nos. POL0000440-464).
5. **Polgar's email communications with Alexander:** Polgar has no email communications with Alexander in her possession, and has not communicated with Alexander for the pendency of this litigation. Your repeated assertions that Polgar was involved in the hacking of Randall Hough's email account and is thus subject to criminal sanction are frivolous, unsupported by the evidence, and inconsistent with your Rule 11 obligations.
6. **The CrystalTech DVD:** The Court ordered you to return the information of third parties on the DVD. This is not limited to information that you deem “not confidential” or “not private”. The Court was clear—“if it’s not relevant to the dispute at hand then you give it back.” Apr. 23, 2009 Tr. at 43:17-18. You also falsely claim that I did not suggest a way for you to correct this problem. I did suggest a correction, and will repeat it here. You must issue a new subpoena that is limited to the information you are entitled to obtain. If responding to the narrowed subpoena imposes costs on the deponent, pay those costs. Had you chosen this alternative, you likely would have received a response weeks ago. As it stands, your subpoena of this information violated multiple federal privacy and electronic communications laws. The fact that you claim to have violated these laws only by

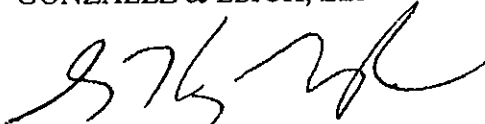
Karl S. Kronenberger, Esq.  
June 10, 2009  
Page 3

"1.69%" is irrelevant. We do not, and cannot agree to your possession of these materials. You were ordered to return these materials months ago, and are in contempt of the Court's order.

Please contact Matt Springman or me if you want to discuss these issues further.

Very truly yours,

GONZALEZ & LEIGH, LLP

A handwritten signature in black ink, appearing to read "G. Whitney Leigh", written over the printed name.

G. Whitney Leigh

GWL:lr  
Enclosures

**EXHIBIT I**



# **Defendants' Privilege Log**

DATE	FROM	TO	DESCRIPTION	EMAILS
9/27/07	Randy Bauer	Bill Goichberg, Joel Channing	Email Correspondence re: litigation strategy	RB
9/27/07	Randy Bauer	Randall Hough	Email Correspondence re: litigation strategy	RB
10/6/07	Randy Bauer	Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: Plaintiff's claims	RB
10/7/07	Randy Bauer	Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
10/7/07	Randy Bauer	Jim Berry	Email Correspondence re: litigation strategy	RB
10/8/07	Randy Bauer	Pat Knight	Email Correspondence re: litigation strategy	RB
10/11/07	Randy Bauer	Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
10/11/07	Randy Bauer	Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
10/11/07	Randy Bauer	Bill Goichberg	Email Correspondence re: litigation strategy	BG
10/19/07	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	RB
10/21/07	Randy Bauer	Joel Channing	Email Correspondence re: litigation strategy	RB
10/24/07	Randy Bauer	Bill Hall	Email Correspondence re: litigation strategy	RB
10/24/07	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	RB
10/25/07	Randy Bauer	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	RB
10/26/07	Randy Bauer	Bill Goichberg	Email Correspondence re: litigation strategy	RB
11/6/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
11/6/07	Randy Bauer	Joel Channing, Bill Goichberg, Jim Berry, Randall Hough	Email Correspondence re: Plaintiff's claims	RB
11/6/07	Randy Bauer	Karl Kronenberger, Bill Hall	Email Correspondence re: Plaintiff's claims	RB
11/6/07	Randy Bauer	Karl Kronenberger, Bill Hall	Email Correspondence re: Plaintiff's claims	RB
11/6/07	Randy Bauer	Karl Kronenberger, Bill Hall	Email Correspondence re: Plaintiff's claims	RB
11/8/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: Plaintiff's claims	RB
11/8/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: Plaintiff's claims	RB
11/8/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
11/9/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: Plaintiff's claims	RB

DATE	FROM	TO	DESCRIPTION	EMAILS
11/14/07	Randy Bauer	Bill Goichberg	Email Correspondence re: litigation strategy	RB
11/29/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
11/30/07	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: Plaintiff's claims	RB
12/6/07	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	RB
12/6/07	Randy Bauer	Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
12/28/07	Randy Bauer	Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
12/29/07	Randy Bauer	Bill Hall, Bill Goichberg, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: litigation strategy	RB
1/3/08	Randy Bauer	Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/3/08	Randy Bauer	Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/3/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/8/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough, Jeremy Brown	Email Correspondence re: litigation strategy	RB
1/12/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough, Jeremy Brown	Email Correspondence re: Plaintiff's claims	RB
1/14/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: Plaintiff's claims	RB
1/15/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/16/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
1/16/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	RB
1/17/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/23/08	Randy Bauer	Bill Goichberg	Email Correspondence re: Plaintiff's claims	RB
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: Plaintiff's claims	RB
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: Plaintiff's claims	RB
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB

DATE	FROM	TO	DESCRIPTION	EMAILS
1/24/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Jeremy Brown	Email Correspondence re: Plaintiff's claims	RB
12/2/08	Randy Bauer	Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB
12/5/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough	Email Correspondence re: litigation strategy	RB
12/17/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
12/19/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
12/26/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
12/27/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
12/30/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
1/2/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
1/3/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	RB
1/4/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
1/9/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
1/10/09	Randy Bauer	Brian Lafferty	Email Correspondence re: litigation strategy	RB
1/16/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
1/19/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
1/22/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
1/22/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty	Email Correspondence re: litigation strategy	RB
1/23/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	RB
1/28/09	Randy Bauer	Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	RB

DATE	FROM	TO	DESCRIPTION	EMAILS
1/28/09	Randy Bauer	Karl Kronenberger, David Herman, Carolyn Grosboll, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
2/17/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
2/24/09	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
2/26/09	Randy Bauer	Chris Slayton	Email Correspondence re: litigation strategy	RB
2/27/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	RB
3/1/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Lafferty, Hal Bogner, Brian Mothershead	Email Correspondence re: litigation strategy	RB
12/6/07	Randy Bauer	Bill Hall, Bill Goichberg, Joel Channing, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Joel Channing, Jim Berry, Randall Hough	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Joel Channing, Jim Berry, Randall Hough	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Joel Channing, Jim Berry, Randall Hough	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Joel Channing, Jim Berry, Randall Hough	Email Correspondence re: Plaintiff's claims	BH
1/28/08	Randy Bauer	Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/28/08	Randy Bauer	Bill Goichberg, Bill Hall	Email Correspondence re: potential litigation	BH
1/28/08	Randy Bauer	Bill Goichberg, Karl Kronenberger, Randy Bauer, Bill Hall	Email Correspondence re: potential litigation	BH
1/30/08	Randy Bauer	Bill Goichberg, J. Brown, Bill Hall, Karl Kronenberger	Email Correspondence re: potential litigation	BH
2/1/08	Randy Bauer	Jeremy Brown	Email Correspondence re: potential litigation	BH
2/15/08	Randy Bauer	Jeremy Brown	Email Correspondence re: potential litigation	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
2/21/08	Randy Bauer	Bill Hall, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
2/22/08	Randy Bauer	Karl Kronenberger, Jeremy Brown, Bill Hall	Email Correspondence re: litigation strategy	BH
3/5/08	Randy Bauer	Bill Hall, Bill Goichberg, Karl Kronenberger	Email Correspondence re: potential litigation	BH
5/14/08	Randy Bauer	Karl Kronenberger, Jeremy Brown, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
5/15/08	Randy Bauer	Karl Kronenberger, Jeremy Brown, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
5/15/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
5/15/08	Randy Bauer	Bill Goichberg, Jim Berry, Randall Hough, Bill Hall	Email Correspondence re: potential litigation	BH
5/15/08	Randy Bauer	Bill Goichberg, Jim Berry, Randall Hough, Bill Hall, Karl Kronenberger, J. Brown	Email Correspondence re: potential litigation	BH
7/30/08	Randy Bauer	Jim Berry	Email Correspondence re: litigation strategy	BH
8/8/08	Randy Bauer	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
8/13/08	Randy Bauer	Karl Kronenberger, Brian Lafferty	Email Correspondence re: litigation strategy	BH
8/14/08	Randy Bauer	Brian Lafferty	Email Correspondence re: litigation strategy	BH
8/16/08	Randy Bauer	Bill Hall, Bill Goichberg, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
8/16/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
8/18/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
8/18/08	Randy Bauer	Bill Goichberg, Randall Hough, Jim Berry, Bill Hall, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
8/19/08	Randy Bauer	Randall Hough, Bill Hall, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
8/19/08	Randy Bauer	Evan Moeller, Bill Hall	Email Correspondence re: litigation strategy	BH
8/21/08	Randy Bauer	Bill Hall, Jim Berry, Bill Goichberg, Randall Hough, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
8/29/08	Randy Bauer	Bill Hall, Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
9/3/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
9/3/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
9/3/08	Randy Bauer	Karl Kronenberger, Randall Hough, Pat Huttenbach, Bill Hall, Bill Goichberg, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
9/5/08	Randy Bauer	Bill Goichberg, J. Brown, Bill Hall, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
9/9/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/11/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
9/11/08	Randy Bauer	Karl Kronenberger, Randall Hough, Bill Hall, Bill Goichberg, Jim Berry, Jerry Hanken, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/12/08	Randy Bauer	Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/17/08	Randy Bauer	Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/26/08	Randy Bauer	Karl Kronenberger, Randall Hough, Bill Hall, Bill Goichberg, Jim Berry, Jerry Hanken, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/22/08	Randy Bauer	Bill Hall	Email Correspondence re: litigation strategy	BH
10/22/08	Randy Bauer	Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/24/08	Randy Bauer	Bill Goichberg, Bill Hall, Jim Berry, Randall Hough, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
10/27/08	Randy Bauer	Pat Huttenbach, Bill Hall, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/7/08	Randy Bauer	Randall Hough	Email Correspondence re: litigation strategy	BH
11/8/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/8/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/8/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/10/08	Randy Bauer	Bill Goichberg, Bill Hall, Jim Berry, Randall Hough, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/10/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/13/08	Randy Bauer	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/13/08	Randy Bauer	Brian LaFerty, Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Randall Hough, Brian Mottershead, Jerry Hanken, Pat Huttenbach, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/15/08	Randy Bauer	Bill Goichberg, Brain LaFerty, Bill Hall, Karl Kronenberger, Pat Huttenbach, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/19/08	Randy Bauer	Bill Goichberg, Bill Hall, Jim Berry, Randall Hough, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
11/26/08	Randy Bauer	Bill Hall, Karl Kronenberger, Pat Huttenbach, and David Herman	Email Correspondence re: litigation strategy	BH
11/26/08	Randy Bauer	Bill Goichberg, Jim Berry, Bill Hall, Pat Huttenbach, Karl Kronenberger, David Herman	Email Correspondence re: litigation strategy	BH
12/2/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/15/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Hal Bogner, Brian LaFerty	Email Correspondence re: litigation strategy	BH
12/2/08	Randy Bauer	Karl Kronenberger, Bill Hall and Pat Huttenbach	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
12/3/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/3/08	Randy Bauer	Bill Goichberg, Jim Berry, Karl Kronenberger, Pat Huttenbach, Jeff Jones, and Bill Hall	Email Correspondence re: litigation strategy	BH
12/3/08	Randy Bauer	Bill Goichberg, Jim Berry, Randall Hough, Karl Kronenberger, Bill Hall and Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/4/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/5/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
12/5/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough	Email Correspondence re: litigation strategy	BH
12/5/08	Randy Bauer	Brian Lafferty	Email Correspondence re: litigation strategy	BH
12/8/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/8/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/29/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/29/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/30/08	Randy Bauer	Karl Kronenberger, Jeff Jones, Bill Goichberg, Randall Hough, Brian Mottershead, Hal Bogner, Brian Lafferty, Jerry Hanken, Jim Berry	Email Correspondence re: litigation strategy	BH
1/2/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/4/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randall Hough, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/9/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
1/10/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Brian Mottershead, Hal Bogner, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/16/09	Randy Bauer	Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Brian Lafferty, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: Plaintiff's claims	BH
1/21/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
1/21/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
1/22/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/23/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Hal Bognet, Brian Mottershead, Jerry Hanken, Brian Lafferty	Email Correspondence re: litigation strategy	BH
1/28/09	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/20/09	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/20/09	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/17/09	Randy Bauer	Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/23/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jerry Hanken, Jim Berry	Email Correspondence re: litigation strategy	BH
3/24/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Brian Lafferty, Brian Mottershead, Hal Bognet, Jerry Hanken	Email Correspondence re: litigation strategy	BH
3/24/09	Randy Bauer	Bill Hall	Email Correspondence re: Plaintiff's claims	BH
3/27/09	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
9/29/07	Bill Goichberg	Bill Hall, Randall Hough, Randy Bauer, Joel Channing, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
9/29/07	Bill Goichberg	Bill Hall, Randall Hough, Randy Bauer, Joel Channing, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
10/11/07	Bill Goichberg	Bill Hall, Randall Hough, Randy Bauer, Joel Channing, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
10/26/07	Bill Goichberg	Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
10/26/07	Bill Goichberg	Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
10/26/07	Bill Goichberg	Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/7/07	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
11/9/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/28/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/28/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/28/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/28/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
11/30/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
12/20/07	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
12/31/07	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Joel Channing, Jim Berry	Email Correspondence re: litigation strategy	BH
1/3/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/4/08	Bill Goichberg	Karl Kronenberger, Michael Masler, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/7/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/7/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/7/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/7/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
1/11/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
1/11/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
1/12/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/12/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: Plaintiff's claims	BH
1/14/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/15/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/18/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Randall Hough	Email Correspondence re: Plaintiff's claims	BG
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: Plaintiff's claims	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: Plaintiff's claims	BH
1/24/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/24/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: litigation strategy	BH
1/24/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/24/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/24/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/24/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Randall Hough, Joel Channing	Email Correspondence re: litigation strategy	BH
1/26/08	Bill Goichberg	Bill Hall, Mike Nolan	Email Correspondence re: litigation strategy	BH
1/28/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/28/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/29/08	Bill Goichberg	Bill Hall, Mike Nolan	Email Correspondence re: litigation strategy	BH
1/30/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/30/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/30/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/1/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/1/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/1/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/1/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/1/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
2/1/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/4/08	Bill Goichberg	Jeremy Brown, Bill Hall	Email Correspondence re: litigation strategy	BH
2/5/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/5/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/6/08	Bill Goichberg	Jeremy Brown, Bill Hall	Email Correspondence re: litigation strategy	BH
2/9/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Joel Channing	Email Correspondence re: litigation strategy	BH
2/18/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Joel Channing	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
2/25/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
2/29/08	Bill Goichberg	Karl Kronenberger, Jim Berry, Joel Channing,	Email Correspondence re: litigation strategy	BG
5/14/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
5/14/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
5/15/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
6/23/08	Bill Goichberg	Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BG
8/13/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
8/16/08	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
8/16/08	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
9/5/08	Bill Goichberg	Karl Kronenberger, Jeremy Brown, Bill Hall, Randy Bauer	Email Correspondence re: litigation strategy	BH
9/23/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Aaron Homer, Evan Moeller	Email Correspondence re: litigation strategy	BH
10/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
10/30/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bognet, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
10/30/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
10/31/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
11/4/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
11/5/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
11/6/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/8/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/10/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/11/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
11/11/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/14/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall	Email Correspondence re: litigation strategy	BH
11/15/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Brian Lafferty, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/15/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Brian Lafferty, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/15/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Brian Lafferty, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/15/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Brian Lafferty, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/17/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall	Email Correspondence re: litigation strategy	BH
11/17/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall	Email Correspondence re: litigation strategy	BH
11/17/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall	Email Correspondence re: litigation strategy	BH
11/18/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/20/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
11/20/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/20/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/20/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/21/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/21/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Hal Bogner, Brian Lafferty, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/21/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/5/08	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Goichberg	Bill Hall	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/9/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/9/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/9/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/9/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead, Brian Lafferty, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/11/08	Bill Goichberg	Karl Kronenberger, Brian Lafferty, Bill Hall	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
12/12/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/12/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/12/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/12/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/13/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/15/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, David Herman, Jeff Rosenfeld	Email Correspondence re: litigation strategy	BH
12/15/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, David Herman, Jeff Rosenfeld	Email Correspondence re: litigation strategy	BH
12/16/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/16/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
12/17/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/17/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
12/17/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, David Herman, Jeff Rosenfeld	Email Correspondence re: litigation strategy	BH
12/18/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
12/21/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, David Herman	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Goichberg	Karl Kronenberger, Bill Hall, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/29/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
1/2/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Hal Bogner, Brian Mothershead, Randall Hough, Randy Bauer, Jim Berry, Jerry Hanken, Brian Lafferty	Email Correspondence re: litigation strategy	BH
1/2/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Hal Bogner, Brian Mothershead, Randall Hough, Randy Bauer, Jim Berry, Jerry Hanken, Brian Lafferty	Email Correspondence re: litigation strategy	BH
1/9/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
1/21/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
1/22/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/22/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/24/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Lafferty, Brian Mottershead, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/24/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Lafferty, Brian Mottershead, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/24/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Lafferty, Brian Mottershead, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/24/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Lafferty, Brian Mottershead, Jerry Hanken	Email Correspondence re: litigation strategy	BH
1/29/09	Bill Goichberg	Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, David Herman, Carolyn Grosboll	Email Correspondence re: litigation strategy	BH
2/8/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/28/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/1/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Lafferty, Brian Mottershead, Jerry Hanken	Email Correspondence re: litigation strategy	BH
3/13/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Lafferty, Brian Mottershead, Jerry Hanken, Evan Moeller, Aaron Homer, Karen Swisher	Email Correspondence re: litigation strategy	BH
3/25/09	Bill Goichberg	Chris Slayton, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/27/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/28/09	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Brian Lafferty	Email Correspondence re: litigation strategy	BH
3/19/09	Bill Goichberg	Jim Berry, Randy Bauer, Randall Hough, Bill Hall, Jeff Jones, Karl Kronenberger, Pat Huttenbach	Email Correspondence re: Plaintiff's claims	BG

DATE	FROM	TO	DESCRIPTION	EMAILS
10/11/07	Bill Hall	Randy Bauer, Joel Channing, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
11/8/07	Bill Hall	Karl Kronenberger, Randy Bauer, Joel Channing, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
11/9/07	Bill Hall	Randy Bauer	Email Correspondence re: Plaintiff's claims	BH
11/28/07	Bill Hall	Karl Kronenberger, Randy Bauer, Joel Channing, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/5/07	Bill Hall	Randy Bauer, Joel Channing, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/10/07	Bill Hall	Randy Bauer, Joel Channing, Bill Goichberg	Email Correspondence re: litigation strategy	BH
12/31/07	Bill Hall	Randy Bauer, Joel Channing, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
1/3/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/3/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/4/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/4/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Michael Matisler	Email Correspondence re: litigation strategy	BH
1/7/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/8/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/11/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Bill Goichberg, Randy Bauer, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/14/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/15/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Jim Berry, Joel Channing, Randall Hough	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/23/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/30/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
2/5/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/22/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/25/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/25/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/26/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/26/08	Bill Hall	Karl Kronenberger, Bill Goichberg	Email Correspondence re: litigation strategy	BG
8/15/08	Bill Hall	Brian Lafferty, Bill Goichberg, Randy Bauer	Email Correspondence re: litigation strategy	BH
8/18/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
8/18/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
8/18/08	Bill Hall	Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
8/19/08	Bill Hall	Evan Moeller, Randy Bauer	Email Correspondence re: litigation strategy	BH
8/19/08	Bill Hall	Evan Moeller, Randy Bauer	Email Correspondence re: litigation strategy	BH
8/19/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
8/19/08	Bill Hall	Evan Moeller, Bill Goichberg, Michael Wilk	Email Correspondence re: litigation strategy	BH
8/19/08	Bill Hall	Evan Moeller, Bill Goichberg	Email Correspondence re: litigation strategy	BH
8/22/08	Bill Hall	Karl Kronenberger, Randall Hough, Bill Goichberg, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	BH
8/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
9/2/08	Bill Hall	Bill Goichberg, Brian Lafferty	Email Correspondence re: litigation strategy	BG
9/2/08	Bill Hall	Brian Lafferty, Brian Mothershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
9/2/08	Bill Hall	Karl Kronenberger, Brian Lafferty	Email Correspondence re: litigation strategy	BH
9/3/08	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Jim Berry, Randall Hough, Joel Channing, Jerry Hanken, Pat Huttenbach	Email Correspondence re: litigation strategy	BG
9/3/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
9/4/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
9/5/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
9/5/08	Bill Hall	Karl Kronenberger, Jeremy Brown, Randy Bauer, Bill Goichberg	Email Correspondence re: litigation strategy	BH
9/10/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/10/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
9/10/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/11/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
9/15/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
9/15/08	Bill Hall	Karl Kronenberger, Brian Lafferty	Email Correspondence re: litigation strategy	BH
9/19/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
9/19/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
9/19/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
9/24/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Evan Moeller, Aaron Homer	Email Correspondence re: litigation strategy	BH
9/22/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
9/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Aaron Homer	Email Correspondence re: litigation strategy	BH
9/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/1/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/2/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Aaron Homer	Email Correspondence re: litigation strategy	BH
10/8/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
10/9/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
10/13/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/13/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/14/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeremy Brown	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
10/16/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
10/17/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
10/21/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/21/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: Plaintiff's claims	BH
10/22/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/22/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randall Hough, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH
10/23/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/23/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/23/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
10/23/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
10/23/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
10/24/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
10/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/30/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
10/30/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
10/31/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Brian Mottershead, Brian Lafferty	Email Correspondence re: litigation strategy	BH
10/31/08	Bill Hall	Michael Maitler, Bill Goichberg, Pat Knight	Email Correspondence re: litigation strategy	BH
10/31/08	Bill Hall	Michael Maitler, Bill Goichberg	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
10/31/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/17/08	Bill Hall	Karl Kronenberger, Margarita Calpouta, Randall Hough	Email Correspondence re: litigation strategy	BH
11/21/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
11/21/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Brian Lafferty	Email Correspondence re: litigation strategy	BH
11/21/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Brian Lafferty	Email Correspondence re: litigation strategy	BH
11/25/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
11/26/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Jim Berry, Randall Hough, David Herman	Email Correspondence re: litigation strategy	BH
12/1/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones	Email Correspondence re: litigation strategy	BH
12/1/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
12/3/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Goichberg, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
12/3/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Goichberg, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
12/3/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
12/5/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Hall	Karl Kronenberger, David Herman, Randall Hough	Email Correspondence re: litigation strategy	BH
12/8/08	Bill Hall	Karl Kronenberger, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/10/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/12/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
12/12/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: Plaintiff's claims	BH
12/12/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
12/12/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
12/15/08	Bill Hall	Karl Kronenberger, Randall Hough	Email Correspondence re: litigation strategy	BH
12/15/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
12/16/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
12/16/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/16/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/19/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/19/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/19/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Hall	Karl Kronenberger, Bill Goichberg, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Hall	Karl Kronenberger, David Herman, Bill Goichberg	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Hall	Karl Kronenberger, Bill Goichberg, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
12/23/08	Bill Hall	Brian Lafferty	Email Correspondence re: litigation strategy	BH
12/29/08	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
12/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
12/29/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, David Herman	Email Correspondence re: litigation strategy	BH
1/5/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Brian Lafferty	Email Correspondence re: litigation strategy	BH
1/5/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, David Herman, Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough, Jerry Hanken, Brian Lafferty, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/7/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
1/7/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
1/7/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/7/09	Bill Hall	Karl Kronenberger, Brian Lafferty	Email Correspondence re: litigation strategy	BH
1/9/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
1/9/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
1/9/09	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
1/14/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
1/14/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/15/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/15/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/15/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/16/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/16/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/16/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/20/09	Bill Hall	Karl Kronenberger	Email Correspondence re: Plaintiff's claims	BH
1/20/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
1/21/09	Bill Hall	Karl Kronenberger, Brian Lafferty	Email Correspondence re: litigation strategy	BH
1/21/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/21/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/21/09	Bill Hall	Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/23/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, David Herman, Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/23/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, David Herman, Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	BH
1/28/09	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
1/28/09	Bill Hall	Karl Kronenberger, David Herman, Carolyn Grosboll	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/28/09	Bill Hall	Karl Kronenberger, Bill Goichberg, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/29/09	Bill Hall	Bill Goichberg, Randy Bauer	Email Correspondence re: litigation strategy	BH
1/29/09	Bill Hall	Karl Kronenberger, David Herman, Carolyn Grosboll	Email Correspondence re: litigation strategy	BH
1/29/09	Bill Hall	Karl Kronenberger, David Herman, Carolyn Grosboll	Email Correspondence re: litigation strategy	BH
1/29/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
2/5/09	Bill Hall	Karl Kronenberger, David Herman, Carolyn Grosboll	Email Correspondence re: litigation strategy	BH
2/6/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/6/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/6/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/8/09	Bill Hall	Karl Kronenberger, David Herman	Email Correspondence re: litigation strategy	BH
2/8/09	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
2/9/09	Bill Hall	Karl Kronenberger, David Herman	Email Correspondence re: litigation strategy	BH
2/9/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
2/10/09	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
2/10/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, David Herman, Jeff Jones	Email Correspondence re: litigation strategy	BH
2/20/09	Bill Hall	Karl Kronenberger, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/20/09	Bill Hall	Karl Kronenberger, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/20/09	Bill Hall	Karl Kronenberger, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/20/09	Bill Hall	Karl Kronenberger, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/24/09	Bill Hall	Karl Kronenberger, David Herman, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
2/27/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/2/09	Bill Hall	Karl Kronenberger, Pat Huttenbach	Email Correspondence re: litigation strategy	BH
3/2/09	Bill Hall	Karl Kronenberger, Brian Mottershead, Hal Bogner, Brian Lafferty	Email Correspondence re: litigation strategy	BH
3/4/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
3/4/09	Bill Hall	Karl Kronenberger, Jeff Rosenfeld, Sumeena Bird, Julie Lockwood, Margarita Calpultura	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
3/9/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
3/9/09	Bill Hall	Jeremy Brown, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/9/09	Bill Hall	Jeremy Brown, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/9/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/17/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Eyan Moeller, Jeff Jones	Email Correspondence re: litigation strategy	BH
3/17/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Eyan Moeller, Jeff Jones	Email Correspondence re: litigation strategy	BH
3/17/09	Bill Hall	Jeff Jones, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/19/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Chris Slayton, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/19/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Chris Slayton, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/20/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
3/20/09	Bill Hall	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
3/23/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
3/23/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
3/26/09	Bill Hall	Karl Kronenberger, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/26/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Montye Holmes, Karen Swisher, Aaron Homer	Email Correspondence re: litigation strategy	BH
3/27/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/27/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH
3/27/09	Bill Hall	Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
7/30/08	Jim Berry	Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough	Email Correspondence re: litigation strategy	BH
9/4/08	Jim Berry	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough, Jerry Hanken	Email Correspondence re: litigation strategy	BH
9/8/08	Jim Berry	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough, Jerry Hanken	Email Correspondence re: litigation strategy	BH
12/3/08	Jim Berry	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough	Email Correspondence re: litigation strategy	BH
12/26/08	Jim Berry	Karl Kronenberger, Pat Huttenbach, Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough, Jerry Hanken, Brian Lafferty	Email Correspondence re: Plaintiff's claims	BH
1/15/09	Jim Berry	Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough	Email Correspondence re: Plaintiff's claims	BH
3/5/09	Jim Berry	Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough	Email Correspondence re: litigation strategy	BH
3/25/09	Jim Berry	Randy Bauer, Bill Goichberg, Bill Hall, Randall Hough, Jerry Hanken	Email Correspondence re: Plaintiff's claims	BH
12/31/07	Randall Hough	Bill Hall	Email Correspondence re: litigation strategy	BH
3/10/08	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry, Joel Channing	Email Correspondence re: litigation strategy	BH
7/29/08	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
8/18/08	Randall Hough	Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH
8/18/08	Randall Hough	Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH
9/3/08	Randall Hough	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/4/08	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
11/26/08	Randall Hough	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH
12/3/08	Randall Hough	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH
12/4/08	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
12/5/08	Randall Hough	Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer	Email Correspondence re: litigation strategy	BH
12/15/08	Randall Hough	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/9/09	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
1/16/09	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
2/20/09	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry, Karl Kronenberger	Email Correspondence re: litigation strategy	BH
3/9/09	Randall Hough	Bill Hall	Email Correspondence re: litigation strategy	BH
3/9/09	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: Plaintiff's claims	BH
3/12/09	Randall Hough	Bill Hall	Email Correspondence re: Plaintiff's claims	BH
3/27/09	Randall Hough	Bill Hall, Bill Goichberg, Randy Bauer, Jim Berry	Email Correspondence re: litigation strategy	BH
12/7/07	Joel Channing	Randy Bauer, Bill Hall, Bill Goichberg, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
1/24/08	Joel Channing	Karl Kronenberger, Randy Bauer, Bill Hall, Bill Goichberg, Jim Berry, Randall Hough	Email Correspondence re: litigation strategy	BH
5/17/08	Jerry Hanken	Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/31/09	Jerry Hanken	Pat Huttenbach, Bill Hall, Karl Kronenberger	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
12/8/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg, Brian Lafferty	Email Correspondence re: litigation strategy	BH
12/8/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg, Jim Berry, Brian Lafferty	Email Correspondence re: litigation strategy	BH
12/9/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
12/9/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
12/9/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
12/14/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Hal Bogner, Brian Lafferty	Email Correspondence re: litigation strategy	BH
12/16/08	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Brian Lafferty	Email Correspondence re: litigation strategy	BH
12/31/08	Brian Mottershead	Bill Hall, Bill Goichberg, Brian Lafferty, Joel Channing	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Mottershead	Karl Kronenberger, Pat Huttenbach, Bill Hall, Hal Bogner, Randy Bauer, Randall Hough, Jerry Hanken, Bill Goichberg	Email Correspondence re: litigation strategy	BH
9/10/08	Karl Kronenberger	Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BG
3/30/09	Karl Kronenberger	Hal Bogner, Brian Lafferty, Bill Hall	Email Correspondence re: litigation strategy	BH
10/6/07	Brian Lafferty	Bill Hall, Bill Goichberg, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
8/17/08	Brian Lafferty	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
8/17/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
8/25/08	Brian Lafferty	Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
8/27/08	Brian Lafferty	Bill Hall, Brian Mothershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
8/30/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
8/30/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
8/31/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
9/2/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
9/7/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/7/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mothershead	Email Correspondence re: litigation strategy	BH
9/15/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/15/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/16/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/18/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/30/08	Brian Lafferty	Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
9/30/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
9/30/08	Brian Lafferty	Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
10/2/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/6/08	Brian Lafferty	Bill Hall, Bill Goichberg, Brian Mothershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
10/9/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
10/9/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/9/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/15/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
10/15/08	Brian Lafferty	Pat Huttenbach, Bill Hall, Evan Moeller	Email Correspondence re: litigation strategy	BH
10/16/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/16/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller	Email Correspondence re: litigation strategy	BH
10/16/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/16/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/17/08	Brian Lafferty	Bill Hall	Email Correspondence re: Plaintiff's claims	BH
10/18/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/18/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/20/08	Brian Lafferty	Pat Huttenbach, Bill Hall	Email Correspondence re: litigation strategy	BH
10/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/22/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller	Email Correspondence re: litigation strategy	BH
10/22/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/24/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
10/26/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/27/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/27/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/27/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/27/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/27/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/28/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/29/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/29/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Randy Bauer, Randall Hough, Hal Bogner, Brian Mottershead, Evan Moeller	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
10/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
10/31/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
10/31/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead	Email Correspondence re: litigation strategy	BH
10/31/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
11/1/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
11/5/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
11/6/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Randy Bauer, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	BH
11/6/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
11/11/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller	Email Correspondence re: litigation strategy	BH
11/13/08	Brian Lafferty	Bill Hall	Email Correspondence re: Plaintiff's claims	BH
11/15/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/15/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/15/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/15/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/15/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/18/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Lori Frank	Email Correspondence re: litigation strategy	BH
11/18/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/18/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller	Email Correspondence re: litigation strategy	BH
11/19/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/19/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/19/08	Brian Lafferty	Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
11/19/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/19/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/19/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/20/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/21/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/22/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/22/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH
11/22/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Mottershead, Hal Bogner, Jerry Hanken	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
11/24/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
11/28/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
11/29/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
11/29/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Brian Mottershead, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/29/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Brian Mottershead, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Brian Mottershead, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
11/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
12/1/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
12/3/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Jeff Jones, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/4/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg, Randy Bauer	Email Correspondence re: Plaintiff's claims	BH
12/5/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/6/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
12/7/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/7/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/8/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Bill Goichberg, Randall Hough, Brian Mottershead, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/8/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/9/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/9/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH





DATE	FROM	TO	DESCRIPTION	EMAILS
12/16/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Bill Goichberg, Randall Hough	Email Correspondence re: litigation strategy	BH
12/16/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Bill Goichberg, Randall Hough	Email Correspondence re: litigation strategy	BH
12/16/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Bill Goichberg, Randall Hough	Email Correspondence re: litigation strategy	BH
12/17/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Evan Moeller	Email Correspondence re: litigation strategy	BH
12/17/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Randall Hough, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/17/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Bill Goichberg, Randall Hough, Brian Mottershead, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/17/08	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
12/18/08	Brian Lafferty	Pat Huttenbach, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/19/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Evan Moeller, Montye Holmes, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	BH
12/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Bill Goichberg, Randall Hough, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Bill Goichberg, Randall Hough, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/20/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Randy Bauer, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/22/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Hal Bogner, Brian Mottershead, Evan Moeller, Montye Holmes	Email Correspondence re: litigation strategy	BH
12/22/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Randy Bauer, Bill Goichberg, Randall Hough	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Randy Bauer	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Jerry Hanken, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
12/23/08	Brian Lafferty	Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Bill Goichberg, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/23/08	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/24/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Hal Bogner, Evan Moeller	Email Correspondence re: litigation strategy	BH
12/24/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Hal Bogner, Brian Mottershead, Evan Moeller, Aaron Homer, Monty Holmes	Email Correspondence re: litigation strategy	BH
12/25/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/25/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Jim Berry, Jerry Hanken, Brian Mottershead, Hal Bogner, Monty Holmes, Aaron Homer	Email Correspondence re: litigation strategy	BH
12/26/08	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
12/27/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Jim Berry, Jerry Hanken, Brian Mottershead, Hal Bogner, Evan Moeller	Email Correspondence re: litigation strategy	BH
12/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Jim Berry, Jerry Hanken, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
12/30/08	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Jim Berry, Jerry Hanken, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/2/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
1/5/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/6/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/7/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/7/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/7/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/7/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/8/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/9/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/9/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner, Randall Hough	Email Correspondence re: litigation strategy	BH
1/9/09	Brian Lafferty	Bill Hall, Randall Hough	Email Correspondence re: litigation strategy	BH
1/10/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Randy Bauer, Randall Hough, Bill Goichberg, Jerry Hanken, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/10/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/14/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/14/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/14/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/14/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/15/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/16/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/17/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH



DATE	FROM	TO	DESCRIPTION	EMAILS
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: Plaintiff's claims	BH
1/20/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/21/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/21/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: Plaintiff's claims	BH
1/22/09	Brian Lafferty	Bill Hall, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
1/22/09	Brian Lafferty	Bill Hall, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	BH
1/23/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/23/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/23/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/23/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
1/27/09	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
1/28/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/1/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/4/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall	Email Correspondence re: litigation strategy	BH
2/4/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Jeff Jones, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/17/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
2/19/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/20/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
2/24/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
2/25/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
2/25/09	Brian Lafferty	Bill Hall	Email Correspondence re: litigation strategy	BH
2/26/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
3/1/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/1/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/1/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH





DATE	FROM	TO	DESCRIPTION	EMAILS
3/13/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Jim Berry, Randy Bauer, Randall Hough, Bill Goichberg, Aaron Homer, Montye Holmes, Karen Swisher, Evan Moeller	Email Correspondence re: litigation strategy	BH
3/13/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Jim Berry, Randy Bauer, Randall Hough, Bill Goichberg, Aaron Homer, Jeff Rosenfeld, Evan Moeller	Email Correspondence re: litigation strategy	BH
3/13/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
3/14/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
3/16/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg, Evan Moeller	Email Correspondence re: Plaintiff's claims	BH
3/16/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: Plaintiff's claims	BH
3/17/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
3/17/09	Brian Lafferty	Karl Kronenberger	Email Correspondence re: litigation strategy	BH
3/18/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/19/09	Brian Lafferty	Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
3/24/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/26/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Aaron Homer, Montye Holmes, Karen Swisher	Email Correspondence re: litigation strategy	BH
3/26/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Aaron Homer, Montye Holmes, Karen Swisher	Email Correspondence re: litigation strategy	BH
3/28/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/28/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	BH
3/28/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/28/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall, Brian Mottershead, Hal Bogner, Jerry Hanken, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/28/09	Brian Lafferty	Randall Hough	Email Correspondence re: litigation strategy	BH

DATE	FROM	TO	DESCRIPTION	EMAILS
3/28/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
3/28/09	Brian Lafferty	Pat Huttenbach, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
3/30/09	Brian Lafferty	Randall Hough	Email Correspondence re: litigation strategy	BH
3/31/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mothershead, Hal Bogner, Jerry Hanken, Jim Berry, Randy Bauer, Randall Hough, Bill Goichberg	Email Correspondence re: litigation strategy	BH
3/31/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: litigation strategy	BH
3/31/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall	Email Correspondence re: litigation strategy	BH
3/31/09	Brian Lafferty	Karl Kronenberger, Bill Hall, Hal Bogner	Email Correspondence re: Plaintiff's claims	BH
3/31/09	Brian Lafferty	Pat Huttenbach, Jeff Jones, Karl Kronenberger, Bill Hall, Brian Mothershead, Hal Bogner, Jerry Hanken, Jim Berry, Randy Bauer, Randall Hough, Bill Goichberg, Aaron Homer, Montye Holmes, Karen Swisher, Evan Moeller	Email Correspondence re: litigation strategy	BH
9/28/07	Michael Maister	Bill Goichberg, Bill Hall	Email Correspondence re: litigation strategy	BH
		Jim Berry's Emails		
11/5/07	Joel Channing	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
12/20/07	Karl Kronenberger	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer, Joel Channing	Email Correspondence re: litigation strategy	JB
6/23/08	Jim Berry	Bill Goichberg, Randall Hough, Randy Bauer	Email Correspondence re: litigation strategy	JB
8/18/08	Randall Hough	Karl Kronenberger, Bill Hall, Bill Goichberg, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
8/19/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
8/20/08	Lori Frank	Jim Berry, Evan Moeller	Email Correspondence re: litigation strategy	JB
8/21/08	Karl Kronenberger	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
8/29/08	Bill Hall	Karl Kronenberger, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB

DATE	FROM	TO	DESCRIPTION	EMAILS
9/9/08	Karl Kronenberger	Pat Huttenbach, Jim Berry	Email Correspondence re: litigation strategy	JB
9/11/08	Pat Huttenbach	Jim Berry	Email Correspondence re: litigation strategy	JB
9/11/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Evan Moeller, Aaron Homer, Karen Swisher, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
9/15/08	Pat Huttenbach	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer, Jerry Hanken	Email Correspondence re: litigation strategy	JB
9/15/08	Pat Huttenbach	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer, Jerry Hanken	Email Correspondence re: litigation strategy	JB
9/17/08	Pat Huttenbach	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer, Jerry Hanken	Email Correspondence re: litigation strategy	JB
10/16/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
10/27/08	Pat Huttenbach	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer, Jerry Hanken, Brian Lafferty	Email Correspondence re: litigation strategy	JB
11/13/08	Karl Kronenberger	Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
11/28/08	Bill Hall	Karl Kronenberger, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
10/30/08	Karl Kronenberger	Pat Huttenbach, Evan Moeller, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer, Jerry Hanken, Brian Mofershead, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	JB
11/7/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
11/8/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
11/9/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
11/9/08	Karl Kronenberger	Bill Goichberg, Jim Berry	Email Correspondence re: litigation strategy	JB
11/9/08	Karl Kronenberger	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
11/9/08	Karl Kronenberger	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
11/10/08	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
11/13/08	Karl Kronenberger	Jim Berry	Email Correspondence re: litigation strategy	JB
11/13/08	Karl Kronenberger	Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB

DATE	FROM	TO	DESCRIPTION	EMAILS
11/18/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Brian Lafferty	Email Correspondence re: litigation strategy	JB
11/21/08	Pat Huttenbach	Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Brian Lafferty	Email Correspondence re: litigation strategy	JB
12/2/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/3/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/3/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/5/08	Randy Bauer	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/9/08	Brian Lafferty	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB
12/9/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Brian Lafferty, Hal Bogner	Email Correspondence re: litigation strategy	JB
12/18/08	Bill Goichberg	Karl Kronenberger, Pat Huttenbach, Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/19/08	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/19/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/19/08	Bill Hall	Karl Kronenberger, Pat Huttenbach, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
12/26/08	Hal Bogner	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Brian Lafferty	Email Correspondence re: litigation strategy	JB
12/27/08	Brian Lafferty	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Jerry Hanken, Brian Mottershead, Hal Bogner	Email Correspondence re: litigation strategy	JB
1/2/09	Randy Bauer	Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
1/5/09	Karl Kronenberger	Pat Huttenbach, Bill Hall, Bill Goichberg, Jim Berry, Joel Channing, Randy Bauer, Randall Hough	Email Correspondence re: litigation strategy	JB
1/21/09	Bill Hall	Bill Goichberg, Randall Hough, Jim Berry, Randy Bauer	Email Correspondence re: litigation strategy	JB
1/22/09	Bill Goichberg	Bill Hall, Randy Bauer, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
1/22/09	Jerry Hanken	Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, Brian Lafferty	Email Correspondence re: litigation strategy	JB
1/23/09	Bill Hall	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry, David Herman	Email Correspondence re: litigation strategy	JB

DATE	FROM	TO	DESCRIPTION	EMAILS
1/28/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB
2/2/09	Randy Bauer	Karl Kronenberger, Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB
2/19/09	Pat Huttenbach	Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB
2/19/09	Randy Bauer	Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB
2/20/09	Bill Hall	Karl Kronenberger, Randy Bauer, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
2/24/09	Karl Kronenberger	Pat Huttenbach, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, David Herman	Email Correspondence re: litigation strategy	JB
3/2/09	Pat Huttenbach	Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB
3/20/09	Randy Bauer	Karl Kronenberger, Bill Hall, Bill Goichberg, Randall Hough, Jim Berry	Email Correspondence re: litigation strategy	JB
3/21/09	Karl Kronenberger	Karl Kronenberger, Jeff Jones, Bill Hall, Bill Goichberg, Randy Bauer, Randall Hough, Jim Berry, Brian Lafferty, Hal Bogner, Brian Mottershead	Email Correspondence re: litigation strategy	JB